

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION



UNITED STATES OF AMERICA)	
)	
)	
v.)	No. 3:12-00120
)	Judge Trauger
)	
JAVIER CORREA)	

MOTION TO WAIVE IN-PERSON REVIEW OF
PRE-SENTENCE INVESTIGATION REPORT

COMES the Defendant and hereby moves the Court to waive the requirement of Local Criminal Rule 32.01(b) which require the defendant's attorney to conduct an in-person review of the Pre-sentence Investigation Report with his client in preparation for the sentencing hearing. The sentencing hearing is scheduled for June 3, 2013.

For cause, counsel states that Mr. Correa resides in Corpus Christi, Texas, and it would be prohibitively expensive for Mr. Correa to travel from Corpus Christi to Nashville to review the Pre-sentence Investigation Report in person with his attorney, especially as he would have to ride the bus for over 24 hours each way for a 1-hour meeting with counsel. At the same time, given the current funding situation counsel cannot afford to go to Texas to meet with Mr. Correa. Mr. Correa does not have any limitations that would make a review of the PSR by phone either unworkable or unproductive.

WHEREFORE, for the reasons above stated, Javier Correa respectfully requests that this Honorable Court waive the requirement of Local Criminal Rule 32.01(b) and allow counsel to review the Pre-sentence Investigation Report with him by telephone.

Respectfully submitted,

s/ Sumter L. Camp
SUMTER L. CAMP
Assistant Federal Public Defender
Attorney for Defendant
810 Broadway Suite 200
Nashville, TN 37203
615-736-5047

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of May, 2013, I electronically filed the foregoing Motion to Waive In-person Review of Presentence Report with the clerk of the court by using the CM/ECF system, which will send a notice of Electronic Filing to the following: the Honorable Blanche B. Cook, Assistant United States Attorney 110 9th Avenue South, Suite A961, Nashville, Tennessee 37203; and the Honorable Adriana Vieco, Civil Rights Division, Criminal Section, Department of Justice, 601 D Street, N.W., Room 5542, Washington, D.C. 20009.

s/ Sumter L. Camp
SUMTER L. CAMP